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5 Attorney for ROBERT McCOMMAS

6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE EASTERN DISTRICT OF CALIFORNIA

8 THE UNITED STATES OF AMERICA,) No. 2:21-cr-110 JAM
9 Plaintiff,)
10 v.) STIPULATION AND ORDER TO
11 JUAN ZAMORA-TORRES,) CONTINUE STATUS CONFERENCE
12 JULIO MENDOZA-MADRIGAL,)
13 DORIAN WILLES,) Requested date: 3-1-2022
14 ROBERT McCOMMAS and) Time: 9:30 a.m.
HEATHER ROMOSER,) Judge: Hon. John A. Mendez
Defendants.)
=====)

15 It is hereby stipulated between the parties, Aaron Pennekamp, Assistant United States
16 Attorney, Noa Oren, Assistant Federal Defender, attorney for defendant JUAN ZAMORA-TORRES,
17 Preciliano Martinez, attorney for defendant JULIO MENDOZA-MADRIGAL, Chris Cosca, attorney
18 for defendant DORIAN WILLES, Michael D. Long, attorney for defendant ROBERT McCOMMAS,
19 and Toni White, attorney for defendant HEATHER ROMOSER, that the status conference set for
20 December 14, 2021, at 9:30 a.m. should be continued and re-set for March 1, 2022, at 9:30 a.m.

22 The parties further agree that this court should make a finding of good cause for the requested
23 extension and that in fact good cause is hereby shown. The government has provided over 100,000
24 pages of discovery. All attorneys continue to read and view the discovery, investigate the case and
25 meet with their respective clients. Counsel for defendants believe that failure to grant the above-
26

1 requested continuance would deny counsel the reasonable time necessary for effective preparation,
2 taking into account the exercise of due diligence.

3 All parties are available to appear in this case on March 1, 2022.
4

5 Each party further stipulates that the ends of justice served by granting such continuance
6 outweigh the best interests of the public and of all the defendants in a speedy trial. Time has already
7 been excluded through December 14, 2021.

8 All parties request the date of March 1, 2022, for the status hearing. The request for extending
9 the date for the status conference is at the specific request of each of the defendants and with the
10 knowing, intelligent and voluntary waiver of each defendant's speedy trial rights under the law. The
11 government agrees that a continuance is necessary. Good cause is hereby shown.
12

13 For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.,
14 within which trial must commence, the time period from today's date to March 1, 2022,
15 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
16 because it results from a continuance granted by the Court at defendants' request on the basis of
17 the Court's finding that the ends of justice served by taking such action outweigh the best interest
18 of the public and the defendant in a speedy trial.
19

20 Dated: November 29, 2021

21 Respectfully submitted,

22 /s/ Michael D. Long
MICHAEL D. LONG
23 Attorney for Robert McCommas

24 /s/ Noa Oren
A.F.D. NOA OREN
25 Attorney for Juan Zamora Torres

26 /s/ Preciliiano Martinez
PRECILIANO MARTINEZ
27 Attorney for Julio Mendoza Madrigal

/s/ chris cosca
CHRIS COSCA
Attorney for Dorian Willes

/s/ Toni White
TONI WHITE
Attorney for Heather Romoser

Dated: November 29, 2021

PHILLIP TALBERT
Acting United States Attorney

/s/ Aaron Pennekamp
AARON PENNEKAMP
Assistant U.S. Attorney

ORDER

GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.

The date for the status hearing in this matter is hereby re-set for March 1, 2022, at 9:30 a.m., before District Court Judge John A. Mendez.

Time is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. Time is excluded through the new hearing date of March 1, 2022.

DATED: November 29, 2021

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE